

*Jonathan Silver*

*Attorney at Law*

*of Counsel*

*Stephen J. Fein*

*Jennifer Beiner*

*Paul G. Kerson*

March 31, 2020

*Crossroad Tower*

*80-02 New Gardens Road, Suite #316, New Gardens, NY. 11415*

*(718) 520-1010*

*Fax No. (718) 575-9842*

Magistrate Judge Steven M. Gold  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: Gursewak Singh v Lintech Electric Inc., et al  
United States District Court EDNY 18 CV5780

Dear Magistrate Gold:

The Court approved revised case management schedule directed on March 2, 2020 that:

Defendant within 10 days will provide plaintiff all banking statements or the period of plaintiff's alleged employment for any account defendant issued checks payable to the plaintiff.

Defendant has failed to comply.

An email to defendant's counsel on March 28 to inquire about that outstanding discovery was ignored.

A follow up email was sent and yesterday, defendant's counsel by email wrote:

We are working on supplementing the bank statements. I'm waiting on my client to provide me a response.

In view of defendant's past history of failing to comply and the limited time left to complete discovery, plaintiff seeks a conference to obtain leave to move to strike defendant's answer and/or preclude defendant from testifying about his banking records and/or other appropriate relief.

Respectfully submitted,

  
JONATHAN SILVER